## U.S. Department of Justice Washington, DC 20530

# Exhibit A To Registration Statement

OMB NO. 1124-0006

Pursuant to the Foreign Agents Registration Act of 1938, as amended

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 et seq., for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <a href="http://www.fara.gov/">http://www.fara.gov/</a>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: http://www.fara.gov/.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

Enwish this publish for EACH foreign principal listed in an initial statement

	Formarly CPM-157		FORM NSD-3
c) Principal aim			
b) Name and title of official with whom registrant	deals		
a) Principal address			
7. If the foreign principal is a foreign political party, state:			
b) Name and title of official with whom registrant Minister of Foreign Aff			
a) Branch or agency represented by the registrant Min isty of Foreign			
6. If the foreign principal is a foreign government, state:			<del></del>
Individual-State nationality		1	<b>3</b> = =
Association	Other (specify):		: RA
Corporation	☐ Voluntary group		GISTI
·		-	
☐ Foreign or domestic organization: If either, ch☐ Partnership	neck one of the following:  Committee		NSD/CES/REGISTRATION
_		2002	ISD/
☐ Foreign political party			72
☑ Foreign government			
5. Indicate whether your foreign principal is one of the foll	lowing:		
Republic of Montenegro Haraugh The Reffe Group		Montenegro	
3. Name of foreign principal  Description of Management	4. Principal address of fo	reign principal Foveign Affairs	
Orion Strategies LLC 918 Pennsylvania Aveise Washington, DC 20003		5437	) 
1. Name and address of registrant		2. Registration N	lo.
<del>_</del>	ditional foreign principal acquired subs		

8. If the foreign principal is not a foreign government or a foreign political party,		
a) State the nature of the business or activity of this foreign principal.		
b) Is this foreign principal	·	
Supervised by a foreign government, foreign political party, or other foreign principal	Yes	No 📙
Owned by a foreign government, foreign political party, or other foreign principal	Yes	No 🗀
Directed by a foreign government, foreign political party, or other foreign principal	Yes	No 🗀
Controlled by a foreign government, foreign political party, or other foreign principal	Yes	No 🗌
Financed by a foreign government, foreign political party, or other foreign principal	Yes	No 🗌
Subsidized in part by a foreign government, foreign political party, or other foreign principal	Yes	No 📙
9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page mi	ust be used.)	
	• • •	NSI 20
		NSD/C 2009 N
		NSD/CES/
		NSD/CES/REGISTRATIOUNIT NO. 29
		/REGISTRATION UNIT
10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreig principal, state who owns and controls it.	n political party or o	/REGISTRATION UNIT
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principal, state who owns and controls it.	n political party or o	/REGISTRATION UNIT
10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign principal, state who owns and controls it.  Date of Exhibit A  Name and Title  Randy Scheunemann  Signature	n political party or o	/REGISTRATION UNIT

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# U.S. Department of Justice Washington, DC 20530

Exhibit B

To Registration Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

OMB NO. 1124-0004

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. One original and two legible photocopies of this form shall be filed for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 et seq., for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <a href="http://www.fara.gov/">http://www.fara.gov/</a>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <a href="http://www.fara.gov/">http://www.fara.gov/</a>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

Orion Strategies LLC	2. Registration No. 5437	NSD/CES/ 2009 NOV
3. Name of Foreign Principal Republic of Montenegro the	rough The Re	<b>♀</b> ≥
Check Apr	propriate Boxes:	
4. The agreement between the registrant and the above-named fo a copy of the contract to this exhibit.	oreign principal is a formal writte	n contract. If this box is checked, attach
5. There is no formal written contract between the registrant and principal has resulted from an exchange of correspondence. If this becopy of any initial proposal which has been adopted by reference in su	ox is checked, attach a copy of all	
6. The agreement or understanding between the registrant and the exchange of correspondence between the parties. If this box is check oral agreement or understanding, its duration, the fees and expenses, is	ted, give a complete description b	
		· · · · · · · · · · · · · · · · · · ·
7. Describe fully the nature and method of performance of the above	indicated agreement or understan	ding.
See attached	d contract	

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Services pursuant to this agreement will include, but not be limited to, advice, guidance , and support for Strategic Communications, public relations, advocacy, Communicating developments in Montenegro to U.S. decision makers, and related activities in the United States and in Europe.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes 📈 No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Advocacy on behalf of the foreign principal with the U.S. Congress and executive branch.

NSD/CES/REGISTRATION UNIT

Date of Exhibit B

11/3/2009

Name and Title
Randy Scheunemann

Signature

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

# ORION STRATEGIES LLC

# SERVICES AGREEMENT

This is an agreement under which Orion Strategies LLC, 918 Pennsylvania Avenue SE, Washington, D.C., 20003, agrees to work with and through The Reffe Group, 3300 Lowell, Street NW, Washington, D.C., 2008 to perform services on behalf of the Ministry of Foreign Affairs of the Government of the Republic of Montenegro.

# **EFFECTIVE DATE/TERM**

The effective date of this agreement is November 1, 2009. The term of his agreement is 12 months, ending October 31, 2010. This agreement may be extended upon agreement by both parties.

#### **SCOPE**

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For the term of this contract, under the direction of The Reffe Group and officials of the Foreign Ministry of the Republic of Montenegro, Orion Strategies LLC will provide advice and consulting services concerning Montenegro's Euro-Atlantic aspirations, including candidacy for membership in the North Atlantic Treaty Organization (NATO). Services pursuant to this agreement will include, but not be limited to, advice, guidance, and support for strategic communications, public relations, advocacy, communicating developments in Montenegro to U.S. decision makers, and related activities in the United States and in Europe.

## **COMPENSATION**

During the term of this agreement, Orion Strategies LLC will be compensated at the rate of \$10,000.00 per month, payable on the first day of each month, for a total of \$120,000.00. Additional expenses will be reimbursed only if approved in advance.

#### **TERMINATION**

This contract may be terminated if the Government of Montenegro fails to pay The Reffe Group.

ORION STRATEGIES LLC

By:

Randy Scheunemann

Date: November 1, 2009

THE REFFE GROUP

Paige Reffe

Date: November 1, 2009